

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**CMS VOLKSWAGEN HOLDINGS, LLC and  
HUDSON VALLEY VOLKSWAGEN, LLC**

**Plaintiffs,**

**-against-**

**VOLKSWAGEN GROUP OF AMERICA, INC.,**

**Defendant.**

**Case No.: 13-CV-3929 (NSR)**

**NOTICE OF CROSS MOTION  
FOR LEAVE TO FILE AN  
AMENDED COMPLAINT**

**PLEASE TAKE NOTICE**, that upon the Declaration of Russell P. McRory, Esq., dated March 3, 2014, and the exhibits attached thereto, and all of the pleadings and papers had herein, plaintiffs CMS Volkswagen Holdings, LLC and Hudson Valley Volkswagen, LLC shall cross-move before the Hon. Nelson S. Román, United States District Judge for the Southern District of New York, at the United States Courthouse located at 300 Quarropas Street, White Plains, New York, New York, on March 19, 2014 for an order, pursuant to Rule 15 of the Federal Rules of Civil Procedure, granting leave to file an amended complaint, and for such other and further relief as the Court deems just and proper.

Dated: March 3, 2014  
New York, New York

**ROBINSON BROG LEINWAND GREENE  
GENOVESE & GLUCK P.C.**

By: /s/ Russell P. McRory  
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